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June 2, 2025

VIA ECF

The Honorable Jennifer L. Rochon, USDJ
United States District Court
Southern District of New York
500 Pearl Street, Room 1920
New York, NY 10007

The requested extension is GRANTED. The deadline for all Defendants to answer or otherwise respond to the Complaint is **June 23, 2025**.

Date: June 2, 2025

New York, New York

Jennifer Rochon
JENNIFER L. ROCHON
United States District Judge

Re: Joseph Cartagena v. Terrance Dixon, Tyrone Blackburn, and T.A. Blackburn Law, PLLC
Case No. 1:25-cv-03552 (JLR)

Dear Judge Rochon:

I represent the defendants in the above-captioned matter. According to Your Honor's Individual Rules of Practice, I respectfully write to request a 21-day extension of time to file the Defendant's motion to dismiss the Amended Complaint (ECF No. 14).

The current deadlines to respond are as follows: Defendants Tyrone Blackburn and T.A. Blackburn Law, PLLC, are required to answer or otherwise respond by June 2, 2025, and Defendant Terrance Dixon's deadline is June 5, 2025. Defendants respectfully request that the Court extend the deadline for all Defendants to file a single, consolidated motion to dismiss to June 23, 2025. This is the Defendants' first request for an extension of this deadline.

The requested extension is necessary to allow the undersigned counsel to coordinate and prepare a unified response addressing the detailed and overlapping factual and legal allegations in the Amended Complaint. A single motion will conserve judicial resources and avoid duplicative or piecemeal filings. This request will not impact any other currently scheduled deadlines or conferences.

I thank the Court for its consideration.

Respectfully submitted,

Tyrone A. Blackburn, Esq.
Tyrone A. Blackburn, Esq.